

REED SMITH LLP

Formed in the State of Delaware

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Attorneys for Defendant Wells Fargo Bank, N.A., incorrectly identified separately as Wells Fargo Home Mortgage and/or Wells Fargo Bank, Wells Fargo Financial Services Company and Wells Fargo and Company

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY**

DAWN DOHERTY F/K/A DAWN
FURLONG,

Plaintiff,

v.

WELLS FARGO HOME MORTGAGE,
and/or WELLS FARGO BANK, WELLS
FARGO FINANCIAL SERVICES
COMPANY, WELLS FARGO AND
COMPANY and/or “JOHN DOE” or
“JANE DOE” (their names being
fictitious and unknown to Plaintiff) and/or
“XYZ CORP” (its name being fictitious
and unknown to Plaintiff)

Defendants.

Civil Action No. 2:24-cv-00362

DOCUMENT ELECTRONICALLY
FILED

Motion Returnable: June 17, 2024

**NOTICE OF DEFENDANT’S
MOTION TO DISMISS
PLAINTIFF’S COMPLAINT
WITH PREJUDICE**

To: Thomas M. Zisa, Esq.
11 Atlantic Street
Hackensack, NJ 0761
Attorney for Plaintiff

PLEASE TAKE NOTICE THAT on **June 17, 2024, at 9:00 a.m.**, or as soon thereafter as counsel may be heard, counsel for Defendant Wells Fargo Bank, N.A., incorrectly identified separately as Wells Fargo Home Mortgage and/or Wells Fargo Bank, Wells Fargo Financial Services Company and Wells Fargo and Company (“Defendant”) shall move before the Honorable Julien Xavier Neals, U.S.D.J., at the Federal District Court for the District of New Jersey located at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, on Defendant’s Motion to Dismiss Plaintiff’s Complaint with Prejudice.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Defendant shall rely on its Memorandum of Law, Certification of Greyson K. Van Dyke, Esq., with exhibits, and Supplemental Declaration of Ryan Bahry Regarding Furlong-Doherty Notice, with exhibits, submitted herewith.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order granting Defendant’s Motion to Dismiss Plaintiff’s Complaint is enclosed herewith.

Dated: May 22, 2024

REED SMITH LLP

/s/Greyson K. Van Dyke
Greyson K. Van Dyke